

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA Liquidation

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

Citivic Nominees Ltd.,

Defendant.

Adv. Pro. No. 12-01513 (SMB)

**SO ORDERED STIPULATION EXTENDING THE DEADLINE TO OBJECT
TO THE TRUSTEE'S MOTION FOR ENTRY OF ORDER PURSUANT
TO RULE 15 OF THE FEDERAL RULES OF CIVIL PROCEDURE AS
INCORPORATED BY RULE 7015 OF THE FEDERAL RULES OF
BANKRUPTCY PROCEDURE GRANTING MOTION FOR LEAVE TO FILE AN
AMENDED COMPLAINT ADDING EUROCLEAR BANK S.A./N.V. AS A DEFENDANT**

WHEREAS Plaintiff Irving H. Picard (the "Trustee"), as trustee for the substantively consolidated liquidation of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act, 15 U.S.C. §§78aaa *et seq.*, and the estate of Bernard L. Madoff, individually, commenced this Adversary Proceeding by filing a complaint against Citivic Nominees Ltd. ("Citivic" or "Defendant") on April 12, 2012; and

WHEREAS, on September 25, 2015, the Trustee filed a Motion For Leave to File an Amended Complaint Adding Euroclear Bank S.A./N.V. ("Euroclear") as a Defendant in this

proceeding (the “Trustee’s Motion”), and which contemplates that the Trustee will dismiss Citivic as a defendant in this action if the Court permits the relief sought in the Trustee’s Motion;

WHEREAS, on September 25, 2015, the Trustee delivered an email to the undersigned counsel for Euroclear with a copy of the Trustee’s Motion;

WHEREAS, Euroclear has not appeared in, and is not a party to, the above Adversary Proceeding and reserves all objections to jurisdiction and service of process, and Euroclear’s counsel is signing this Stipulation for the sole purpose of extending Euroclear’s time to object to the Trustee’s Motion, including objections to jurisdiction and service of process, if so decided;

WHEREAS, the deadline to object to the Trustee’s Motion is set for October 12, 2015 with a hearing scheduled for October 28, 2015;

WHEREAS, the parties and Euroclear have agreed through their undersigned counsel to extend the objection deadline and adjourn the hearing on the Trustee’s Motion to allow sufficient time for Euroclear to object and respond, if so decided; and

NOW, THEREFORE, subject to the approval of the Court, it is hereby STIPULATED AND AGREED that the deadline to object to Trustee’s Motion is extended up to and including November 11, 2015, and the hearing on the Trustee’s Motion is adjourned to November 18, 2015.

[Remainder of page intentionally left blank]

Dated: October 8, 2015
New York, New York

BAKER & HOSTETLER LLP

CLEARY GOTTLIEB STEEN &
HAMILTON LLP

By: /s/ Thomas L. Long
David J. Sheehan
dsheehan@bakerlaw.com
Thomas L. Long
Email: tlong@bakerlaw.com
Catherine E. Woltering
Email: cwoltering@bakerlaw.com
45 Rockefeller Plaza
New York, New York 10111
Telephone: (212) 589-4200
Facsimile: (212) 589-4201

*Attorneys for Plaintiff Irving H.
Picard, Trustee for the Liquidation
of Bernard L. Madoff Investment
Securities LLC*

ARNOLD & PORTER LLP

By: /s/ Charles G. Berry
Charles G. Berry
Email: Charles.Berry@aporter.com
399 Park Avenue
New York, New York 10022
Telephone: (212) 715-1169
Facsimile: (212) 715-1399

Attorneys for Non-Party Euroclear Bank S.A./N.V.

SO ORDERED this 8th day of October, 2015.

/s/ STUART M. BERNSTEIN
HONORABLE STUART M. BERNSTEIN
UNITED STATES BANKRUPTCY JUDGE